

**TECHNICAL REVIEW DOCUMENT
FOR
RENEWAL OF OPERATING PERMIT 95OPBO082**

to be issued to:

CEMEX, Inc.
Lyons Cement Plant
Boulder County
Source ID 0130003

Cathy Rhodes
February 2004
Revised By Jacqueline Joyce
July - November 2007 and January 2008

I. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the renewal Operating Permit proposed for this site. The original operating permit was issued February 1, 2000 and expires on February 1, 2005. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted February 1, 2004, comments made on the draft permit made by citizen, citizen groups and Boulder county during the public comment period (January 3 through February 3, 2006 and April 18 through May 19, 2006), minor modification applications submitted on March 17, 2005, June 1, 2007 and September 17, 2007 and additional information submitted on October 31, 2007. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

II. Source Description

This facility manufactures Portland Cement. The facility is located approximately 12 miles north of Boulder, near the town of Lyons. There are no affected states within 50 miles of the facility. Rocky Mountain National Park, Rawah Wilderness Area, and Eagle's Nest Wilderness Area are Federal Class I designated areas within 100 kilometers of the plant.

Facility wide emissions are as follows (tons/year):

Pollutant	Actual	Potential
Particulate Matter	725	828
Particulate Matter Less than 10 Microns (PM ₁₀)	340	420
Nitrogen Oxides (NO _x)	1,707	2,662
Sulfur Dioxide (SO ₂)	160	1,376
Volatile Organic Compounds (VOC)	130	233
Carbon Monoxide (CO)	121	453
Lead (Pb)	Negligible	0.44

Actual emissions data obtained from information submitted with application for revisions to Construction Permits, are based on 1996 and 1997 data. Note that SO₂ and Pb emissions are low because natural gas was used at the dryer instead of coal during these years. Potential emissions are based on information submitted with the Operating Permit application.

II. Discussion of Modifications Made

Source Requested Modifications

The permittee requested the following revisions to the Operating Permit in their renewal application.

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The Facility Contact Person is changed.
The company address is changed.

Section II – Specific Permit Terms

Condition 1.4 – Reference to the Larimer Quarry is deleted. The construction permit for the Quarry has been canceled, and all activities at the site are discontinued.

Condition 2.2 – Revised to indicate the conveyor transfer points are also subject to NSPS Subpart OOO. Previously, the Division had determined that the conveyor transfer points and all equipment thereafter were part of the “portland cement plant” and were subject to NSPS Subpart F. Based on EPA guidance and the MACT regulation definitions, the Division has revised the determination.

Condition 3.3 – Previously the Division had determined that these activities were “raw material storage” subject to NSPS Subpart F. Based on EPA guidance and MACT definitions, these activities do not fall under any of the activities listed under NSPS Subpart OOO or Subpart F.

Conditions 3.5.5 and 3.5.7

Construction Permit conditions are combined into one condition, since requirements are similar.

Condition 5.1 – The permittee requests that the annual natural gas consumption limit be removed. Condition 5.3 limits annual BTU throughput. The Division has determined that the BTU limit is sufficient for estimating emissions to determine compliance with the emission limits for the dryer.

Condition 10.4.1 – The permittee requests that the 0.30 lb PM/ton feed limit be removed, since Condition 10.5 requires the permittee to meet a limit of 0.275 lb/ton feed. Condition 10.4.1 is removed because the NSPS Subpart F requirements no longer apply (the MACT standard is now in effect). The Division has not streamlined out the MACT standard because the MACT standard and the 0.275 lb/ton limit are not equivalent for comparison purposes. The MACT standard contains extensive testing, monitoring, recordkeeping and reporting requirements.

Condition 10.8 (Now Condition 10.7) – The permittee requested the removal of the VOC limit of 138 tons/year and subsequent requirement to install, maintain, and operate a continuous monitoring system for VOCs. The requirement to install a CEMS is removed, however, in accordance with Regulation No. 3 requirements, a VOC limit must still be included. To address the Regulation No. 3 requirement, the permittee subsequently proposed to conduct stack testing once per permit term to determine the appropriate emission factor or if VOC emissions are below the de minimis permitting level. Until such time as the first stack test is conducted, the Division will require VOC emissions to be estimated using the emission factor originally used to establish the 138 tons/year limit (41.4 lbs/hour – stack test results). Should stack test results indicate that the emissions are below the de minimis permitting level, the permittee will apply to have the emission limit removed from the permit.

Condition 10.10 – The permittee requests compliance testing conducted using a “representative fuel design” in lieu of testing each individual fuel, when “significant changes in fuel design” are made. The Division has revised this condition to reflect the testing language for PM in Condition 10.4. In the event a fuel other than natural gas is not used for more than 45 days, and no testing is required, the permittee shall use the emission factors used to establish the emission limit to estimate actual emissions (0.01 lb/ton feed as requested in April 22, 1999 letter).

Condition 12.4 – On April 5, 2002 and July 5, 2002 the EPA published direct final rules to clarify which coal handling activities are subject to the portland cement plant MACT, and which are not. Those activities not subject to the MACT would be subject to the Subpart Y New Source Performance Standards, if applicable. The rule states: “The only Subpart Y sources potentially subject to Subpart LLL...are the transfer points used to convey coal from the mill to the kiln. Other Subpart Y transfer points (such as those transferring coal from a barge to a coal pile) continue to be subject to Subpart Y, as appropriate.” Subpart Y defines a “coal preparation plant” as any facility which prepares

coal by one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying.” The CEMEX plant does not perform any of these activities, therefore no part of its facility is a coal preparation plant and no sources are subject to Subpart Y.

Throughout: The permittee requests the following changes to the equipment list and emission limits. Revisions were or were not made as described below.

Conditions 5.7, 10.4, and 11.4, NSPS Subpart F standards are removed. Sources subject to the MACT standard are exempt from the NSPS standards after the MACT compliance date.

- A. A number of changes were requested for emission points permitted under permits 98BO0259 and 98BO0315. The 2004 revisions to 98BO0259 and 98BO0315 accommodate these requests.
- B. Move S025 - coal unloading bin from P013 to P014. This source was not permitted for P013 (Construction Permit 98BO0259). C10316, for P014 does not include any emission limits.
- C. Clinker Drag Chains – S017 is added to P008. Emissions from this source are controlled by a baghouse, and were included in limits for P008.

2004 Construction Permit Modifications

In March of 2004, the permittee applied for modifications to Construction Permits 98BO0259 and 98BO0315. Revisions to bagfilters were made in accordance with Compliance Order requirements. The permittee has requested the Division to incorporate these Construction Permit requirements and other Consent Order requirements into the Operating Permit.

The due date of the first semi-annual monitoring and deviation report required by this operating permit will be more than 180 days after the initial approval construction permits 98BO0259 and 98BO0315 were issued and/or the equipment commenced operation. Therefore, under the provisions of Regulation No. 3, Part C, Section V.A.2., the Division is allowing the initial approval construction permit to continue in full force and effect and will consider the Responsible Official certification submitted with that report to serve as the demonstration required pursuant to Regulation No. 3, Part B, Section IV.H. and no final approval construction permit will be issued. The appropriate provisions of the initial approval construction permit have been directly incorporated into this operating permit. Applicable requirements are as follows:

Construction Permit 98BO0315
(only new applicable requirements are listed)

- Limit PM/PM₁₀ emissions on a rolling twelve month basis, and PM₁₀ on monthly, and daily bases
- Limits hours of operation to 8064 (Note: Waste dust silo emissions are based on 8064 hours, Cement Silo A5 and loading spout emissions are based on 3000 operating hours)
- Fugitive PM control measures are added/revised.
- (monitoring – based on flow rate, etc.)

Construction Permit 98BO0259

- Emission limits for certain activities/sources are increased/decreased
- Requires the new baghouses at P010 to meet 0.02 gr/dscf. Operating parameters are to be identified prior to final approval, to replace the control efficiency requirement. Separator emissions are changed from .01 to .006 gr/dscf. There is no control efficiency listed in the Construction Permit. Compliance with the emission grain loading limit will be monitored using the operating and maintenance requirements in the operating permit.
- Fugitive emission control measures are added/revised. Note that the first measure references NSPS Subpart F opacity. Subpart F no longer applies and is replaced by the MACT standard. The language is therefore revised to reference Subpart LLL of the MACT standards.

The identification number for P010A is changed to P015.

Consent Order Requirements (Compliance Order on Consent 2002-124)

The following requirements from the Consent Order are incorporated into the Operating Permit (Note some requirements were already included in 2004 revised construction permits):

Section II, Condition 1.3

Provisions for minimizing fugitive emissions during blasting activities are added.

Note: The Consent Order requires records to be kept for no less than two years. Title V rules require records to be kept for at least five years.

Condition 10.7 – Revised to require calculation of PM emissions from the kiln and clinker cooler in accordance with Part 63.

Condition 11.5.10 – Night shift sweeping and watering requirements for the Outdoor Clinker Discharge area are added.

Condition 13.7 – Adds CKD disposal requirements.

Condition 14.3 sets forth haul road treatment requirements.

Condition 25 is added for water truck requirements.

Condition 26 is added for fugitive or excess emissions observations and complaints.

Minor Modification to P011

On March 17, 2005 CEMEX requested a minor modification to their operating permit to install a bulk addition system to deliver raw limestone to its finish mill. This resulted in a

1.12 tpy increase in PM emissions and a 0.56 increase in PM₁₀ emissions for P011, for totals of 17.05 tpy PM and 8.65 tpy PM₁₀. Hourly and daily emissions from this activity are offset by a reduction in the amount of clinker entering the mill, therefore the P011 hourly and daily emission limits remain the same.

Other Modifications

In addition to the changes requested by the permittee, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the CEMEX, Inc. Operating Permit:

Page following Cover Page

Note regarding when reports must be received by the Division is added to the report schedule.

Change permit contact information.

Section I – General Activities and Summary

Condition 1.5 is added to include Compliance Assurance Monitoring requirements.

Condition 2.1 revised to reflect current Division language and updated Regulation No. 3 cites.

Revised Condition 3 to reflect current Division policy.

Section II – Specific Permit Terms

Condition 1.4 – delete reference to reclamation activities, as 1999 date has passed.

Conditions 5.4, 10.4, 11.3, 13.2, 20 - revised to replace “operating experience” with “good operating practices” in accordance with EPA comments regarding other operating permits.

Condition 5.5 – Revise stack test language to reflect current Division policy.

Conditions 10.5 and 10.6 revised to reflect current Regulation No. 1 opacity language.

Condition 11.3 – Correct P012 grain loading emission factor.

Conditions 13.2 and 13.4 – Due to concerns regarding the operation of the A5 Silo baghouse discovered during Division inspections, additional periodic monitoring

requirements are added (pressure drop readings) to ensure proper operation of the control equipment.

Condition 16 – Length of opacity violation language is revised to reflect current Division policy.

CAM requirements are set forth in Condition 24.

Section III – Permit Shield

The title of Condition 1 is revised. The regulatory cite is updated.

Section IV – General Conditions

Add note Condition 3.g to indicate that it applies only to state-only applicable requirements until the EPA approves it into the SIP.

Update Open Burning cite for Condition 17.

Update Regulation No. 3 citations.

Appendices B and C

Update to reflect current Division version.

Appendix D

Update EPA addresses.

Compliance Assurance Monitoring (CAM)

Emission points that use a control device to achieve compliance with an emission limitation or standard and have precontrolled emissions that exceed or are equivalent to the major source threshold are subject to the CAM provisions at time of permit renewal, unless they qualify for an exemption. Emission limitations or standards proposed by the EPA after November 15, 1990 under the NSPS or MACT provisions are exempt from the CAM requirement. Numerous controlled sources at this facility are subject to the MACT standard for Portland Cement Manufacturing Industry, therefore for those sources, the MACT standard is not subject to the CAM requirements. There are sources at this facility equipped with control equipment which are not subject to the MACT requirements. In addition, sources subject to the MACT requirements are also subject to other emission limits. These other emission limits are subject to CAM. The following table lists controlled sources at this facility, the potential uncontrolled emissions, and emission limits subject to CAM. Note: Opacity limits are not subject to CAM.

Stack # - Source/Activity	Uncontrolled PM/PM ₁₀ PTE* (tons/year)	Emission Limits Subject to CAM
P017 - Dowe Flats 026 – Conveyor	46.5	None (<100 tpy)
Dowe Flats 027 – Primary Crusher	10.5	None (<100 tpy)
P001		
S002 – Primary Crushing	943	Reg. 1 PM weight rate***
S004 - Surge Silo to Dryer	78	None (< 100 tpy)
P002 – Raw Material Drying		
S005 – Raw Materials Drying	1621 (114 Pb)	22.8 tons/year PM/PM₁₀ 6.5 lbs/hour PM₁₀ 1.6 tons/year Pb
P003 – Secondary Crushing and Screening		
S003 – Belt Transfer	178	Reg. 1 PM weight rate***
P004 – Raw Material Storage		
S006 – Raw Silo No. 1	314	Reg. 1 PM weight rate***
S007 – Raw Silo No. 5	164	Reg. 1 PM weight rate***
S008 – Raw Silo No. 3	164	Reg. 1 PM weight rate***
P005 – Raw Mill Grinding		
S012 – Raw Mill Feeders	728	Reg. 1 PM weight rate***
S013 – Iron/Silica Silo	164	Reg. 1 PM weight rate***
S010 – Raw Material Grinding	600	Reg. 1 PM weight rate***
S011 – Raw Mill Auxilliary Dust Collector	386	Reg. 1 PM weight rate***
P006 – Homogenizing and Blending		
S014 – Homogenizing Silo	550	Reg. 1 PM weight rate***
S015 – Kiln Feed Silo	150	Reg. 1 PM weight rate***
P007		
S016 – Precalciner Kiln	6036 440 Pb	133 tons/year PM/PM₁₀(Kiln and Clinker) 0.275 lb PM/PM₁₀/ton feed** 4.4 tons/year Pb (Kiln and Cooler)**
P008		
S018 – Clinker Cooler	3086	See Kiln Above
P009 – Glinker/gypsum silos and weigh feeders		
S026 – Weigh Feeder 1	12	None (<100 tpy)
S027 – Weigh Feeder 2	12	None (<100 tpy)
S029 – Weigh Feeder 4	12	None (<100 tpy)
S030 – Weigh Feeder 5	12	None (<100 tpy)
S031 – Weigh Feeder 6	12	None (<100 tpy)
S032 – Bottom of A Frame Transfer	123 PM/60 PM₁₀	Part of 7.82 tons/year PM (PM₁₀ <100 tpy)
S024 - #2 Clinker Silo	171 PM/90 PM₁₀	Part of 7.82 tons/year PM (PM₁₀ <100 tpy)

Stack # - Source/Activity	Uncontrolled PM/PM ₁₀ PTE* (tons/year)	Emission Limits Subject to CAM
S035 – Discharge of 629-3 Belt	85	None (<100 tpy)
S039 –Finish Mill Weigh Feeder	85	None (<100 tpy)
S040 – Finish Mill Weigh Feeder	85	None (<100 tpy)
S041 – Finish Mill Weigh Feeder	85	None (<100 tpy)
S038 - Surge Bin	85	None (<100 tpy)
P010 – Sheltered Clinker Storage		
S024A – Top of A Frame	410	21.96 tons/year PM 10.98 tons/year, 1.37 tons/month, 201 lb/day PM ₁₀
S0??- #6 Reclaim Feeder	1785	
P011 – Cement Finish Mill and Auxiliaries and Lime Handling		
S036 – Finish Mill	714	17.05 ton PM/year 8.65 ton PM ₁₀ /year 0.71 ton PM ₁₀ /month 48 lbs PM ₁₀ /day
S037 – Finish Mill Auxillary Dust Collector	543	
P012 – Separator		
S065 – Separator	4486	21.52 ton PM/year 10.76 ton PM ₁₀ /year 1.61 ton PM ₁₀ /month 107 lbs PM ₁₀ /day
P013 – Cement Storage Silos/Packhouse/Loadout		
S043 – Cement Silos A10 and A13	271	11.39 ton PM/year (P013 total) 5.70 ton PM ₁₀ /year (P013 total) 0.72 ton PM ₁₀ /month (P013 total) 43 lbs PM ₁₀ /day (P013 total)
S044 – Cement Silo A7	271	
S046 – East Load Spout	100	
S047 – West Load Spout	136	
S048 – Recirculating System	76	None (<100 tpy)
S049 & S050 – Packhouse	560 each	11.39 ton PM/year (P013 total) 5.70 ton PM ₁₀ /year (P013 total) 0.72 ton PM ₁₀ /month (P013 total) 43 lbs PM ₁₀ /day (P013 total)
S049 – Packer	400	
S050 – Packer	400	
P014 – Clinker and Fuel Handling		
S020 – Coal Silo	186	Reg. 1 PM weight rate***
S025 – Coal/Clinker Hopper		Reg. 1 PM weight rate***
P007A – Handling & Processing of CKD & Raw Material Waste Dust		
S001 – Waste Dust Silo	976	15.39 tpy PM 7.7 tpy/.96 lb/month/69.5lbs/day PM ₁₀
S066 – Cement Silo A5 (CKD)	83	None (<100 tpy)
S067 – CKD Loading Spout	83	None (<100 tpy)
040A – Conveyance of CKD to Silos	472	4.72 tpy PM 2.35 tpy, .33 lb/month, 25 lbs/day PM ₁₀
040B – Conveyance of Benefication Dust to Silo		

*Limits on hour of operation/throughput rate included in calculating PTE. All listed sources are equipped with bagfilters for control of PM.

**For these emission limits, MACT monitoring is presumptive CAM.

***These sources are subject to the Regulation No. 1 PM weight rate limit. The Regulation No. 1 limit is very generous. Based on information provided in the renewal application and the Construction Permit files, the Division has determined that these sources can meet the Regulation No. 1 limit without the bagfilters, therefore the Regulation No. 1 limit is not subject to CAM for these sources.

CAM for these sources is daily visible emission observations and pressure drop readings.

PUBLIC COMMENT REVISIONS

The following revisions were made to the permit in response to comments received during the public comment period (January 3, 2006 through February 3, 2006), the public hearing (held on April 18, 2006) and the additional 30-day public comment period granted by the Commission during the public hearing (ended on May 19, 2006).

Section II – Specific Permit Terms

General – the permit was revised to include twelve month rolling totals for emissions and production limits, where applicable. Note that in cases of fugitive emissions where compliance is based on meeting the production limits, the twelve month rolling total for emissions is not included.

Condition 1.3 - Records of the observations shall be maintained and made available for Division review upon request. Language added to indicate that the 20% opacity, no off-property transport, and nuisance emission limitation are guidelines and not enforceable standards and no person shall be cited for violation thereof pursuant to C.R.S. 1973, 25-7-115 as amended. The annual certification statement requirement is removed from the permit, in accordance with current Division policy.

Conditions 2.3, 4.3, 6.3, 7.3, 8.3, 9.3 and 12.2 – The last sentence was modified to state the following: “In the absence of credible evidence to the contrary compliance with the particulate matter limit is presumed provided the baghouse operating and maintenance requirements specified in Condition 20 (or Condition 21) are met”.

Condition 10 – Revise Summary Table with respect to Condition 10.3 under the column header “Limitations” to specify “Petroleum Coke/Coal Blend, 10,00 tons/yr, Blend not to exceed 10% petroleum coke and petroleum coke not to exceed 2% sulfur by weight”.

Condition 10 – Revise Summary Table with respect to Condition 10.3 under “Limitations” to include the annual limitations for coal, natural gas and tires that were included in the underlying construction permit.

Condition 10.3 – Requires 60 day advance notice to the Division prior to tire burning. Require 10/90 percent coke/coal blend, limit blend use (10,000 tons/yr) and limit sulfur content of petroleum coke used in blend to 2% by weight. Compliance with the fuel sulfur limit shall be monitored by sampling each shipment of petroleum coke.

Condition 10.3 – Include limitations on annual consumption of blend, natural gas, coal and tires that were in the underlying construction permit. Compliance with the limitations shall be on a rolling twelve month total.

Condition 10.4 – Requires PM stack testing within 45 days of commencement of tire burning. Remove startup, shutdown, and malfunction exemption for 0.275 lb PM/ton limit.

Condition 10.5 – Adds requirements for records of each spray tower blasting event, requires opacity reading during event, and submittal of records and COM data on a quarterly basis.

Condition 10.7 – Requires annual VOC stack tests. Requires VOC stack test within 45 days of commencement of tire burning.

Condition 10.10 – Add baghouse operation and maintenance monitoring for lead emission limit.

Condition 10.13 – Added language in the Summary Table and text indicating that a performance test for dioxins/furans is required within 45 days of burning tires.

Condition 12.4 – Clarify that the MACT provisions apply to the clinker hopper.

Condition 13 – in Summary Table indicate that the 10% opacity requirement is a MACT requirement (Condition 13.3).

Condition 16 – This condition was revised to require corrective action if visible emissions are observed.

Condition 21 – Monitoring is added for the 30% opacity limits.

Condition 23.5 - Revised the language to reflect regulatory revisions regarding startup, shutdown malfunction plans (SSMPs) that were published in the federal register on April 20, 2006.

Condition 23.4.1 - the operation and maintenance requirements were revised due to changes published in the federal register on April 20, 2006 (see above). The full language in 63.6(e)(1) is included and is included as Conditions 23.4.1 thru 23.4.3. Condition 23.4.2 is renumbered as 23.4.4.

Condition 23.8 – Requires submittal of excess emissions and CMS summary reports on a quarterly, instead of semi-annual, basis.

Condition 23 – under “performance testing” for non-opacity standards, added a requirement to require a test for dioxins/furans within 45 days of burning tires.

Condition 25.3 –Requires operation of the truck wash.

Section IV – General Conditions

Condition 3.d – replace “upset conditions and breakdown” provisions with “affirmative defense provisions for excess emissions during malfunctions”.

Conditions 5 and 21 – replaced the reference to “upset” with “malfunction”

Condition 21 – Revise definition of “prompt.”

Changes Made to CEMEX October 2006 version of Title V Draft Renewal Permit

Changes were made to the CEMEX, Inc. permit in 2007 prior to forwarding the permit to EPA for their 45-day review period. The changes were made to reflect changes in regulations, to correct errors and/or to make the permit more consistent with other recently issued Title V permits. In addition, CEMEX, Inc. submitted minor modification applications on June 1, 2007 to replace two baghouses (225-3 and 525-8) and September 17, 2007 to replace the CKD loadout spout and corresponding baghouse (825-7). The provisions for this minor modification were included in the renewal permit. Note that a minor modification to a Title V operating permit (Colorado Regulation No. 3, Part C, Section X) is not subject to a 30-day public comment period, although it is subject to an EPA 45-day review period. Therefore, the Division considers that even though this renewal permit has gone through public comment, making these revisions prior to the EPA 45-day review period is appropriate.

Corrections and Consistency Changes

Page Following Cover Page

Next to “And Additional Information Received” removed April 23, 2004 since it was not clear what information this refers to since it was not noted in the technical review document. The appropriate dates for additional information were included in this space and are noted in the technical review document.

General

Format changes (i.e. text indents, table properties (table size, text font, borders, etc.)

Section I – General Activities and Summary

Condition 1.1 – revised to correctly address the attainment status of the area and to indicate that the definition of the 8-hour ozone control area is in Regulation No. 7, rather than refer to the federal register. Note that the revisions include language to note that

the facility is located in an ozone nonattainment area. The nonattainment area designation is expected to be made prior to issuance of this permit.

Condition 1.3 – added a statement to Condition 1.3 specifying that requirements from compliance orders on consent remain as applicable requirements and added construction permit 05BO0703 to the list.

Condition 1.4 – revised some of the wording regarding state-only requirements. Added Section IV, Conditions 3.d and 3.g (last paragraph) as state-only requirements. The last sentence in this condition was removed and added as Condition 1.5 to be consistent with other T5 permits.

Condition 1.4 – removed Section II, Conditions 2.8, 3.6, 5.10, 10.7, 11.7, 13.7 and 22.3, as these conditions either don't exist or are not related to the State-only opacity requirements in Reg 6, Part B, Section III.C.3. The state-only opacity requirements were streamlined in favor of more stringent requirements (see Section III.3 of the permit).

Condition 1.4 – the reference to Section II, Condition 10.12 was corrected to Section II, Condition 10.11.

Condition 1.5 – new condition, includes last sentence from Condition 1.4 (see above).

Condition 2 – revised to correctly indicate that attainment status of the area in which the source operates and to correct some of the regulatory citations and added a condition 2.3 to indicate whether other operating permit should be considered for PSD and/or nonattainment area new source review (NANSR) review purposes.

Condition 3 – text was numbered as condition 3.1 to be consistent with other T5 permits.

Condition 4.2 (Alternative Operating Scenarios) – to be consistent with other permits, this was numbered as Condition 5 with a sub-condition 5.1 and 5.1.1.

Due to the above, CAM requirements were renumbered as Condition 6. The first paragraph under this condition is numbered as Condition 6.1.

Section II – Specific Permit Terms

General

- monthly throughput and emission limits are included in the permit for numerous emission units. The monthly limits were only intended to apply for the first year of operation after initial operation or following a modification such as an increase in the production or consumption rate, which is noted in the permit. Since it has been more than one year of operation since initial operations and/or a modification, the monthly limits will be removed. Monthly limits were removed

from the following permit conditions: 1.1, 1.2, 2.1, 2.4, 3.1, 3.2, 11.1, 11.3, 13.1 and 13.2.

- there are several instances where the permit indicates that stack testing is required once per permit term and/or every five years. This language was revised to clarify that testing shall be every five years. The following permit conditions were revised to reflect that testing shall be every five years: 2.2, 5.5, 11.3 and 13.2.
- there are several instances where the permit indicates that stack testing can be less frequent than annual, if the test results are less than 50% and 75% of the limitation. Subsequent testing in these cases is based on the permit term. The language has been revised to set a clearer deadline (within 5 years if less than 50% of the limit, within 3 years if less than 75% of the limit). The following conditions with these changes are: 5.4 and 10.4.

Section II.1 – Dowe Flats Quarry Fugitive Dust Sources

- Although previously indicated on page 6 of this document, the reference to reclamation activities was restored in Condition 1.4 of the permit. Reclamation activities have not been completed as previously expected. Reclamation activities must be considered in determining compliance with the Lyons Quarry emission limitations and the overall process limits.
- Removed the statement under condition 1.3 requiring that the annual certification indicating that activities were suspended when the average wind speed exceeded the 30 mph threshold. The annual certification serves as the indicator as to whether the source complied with the provisions of suspending operations when the average wind speed exceeded the 30 mph threshold.

Section II.3 – Storage and Handling of Raw Materials

- removed the annual certification statement from Condition 3.2 and 3.4, to be consistent with current Title V permits.
- Revised Conditions 3.4.1 and 3.4.4 to remove the 3 foot requirement for the drop height.
- Removed the requirement from Condition 3.4 to install a marker to indicate a distance of 3 feet above the top of the hopper.

Section II.5 – Raw Materials Drying

- added a statement in Condition 5.2 indicating that the coal consumed in the dryer shall be included in the heat input limit in Condition 5.3.
- The language in Condition 5.4 implies that annual testing is required if coal is used as fuel (provided coal is burned more than 45 days in any calendar year); however, Condition 5.5 seems to indicate that testing, if applicable, is only once per permit term when burning coal. Therefore, the Division has revised the permit to specify that the test when burning coal would be a one-time test. Note that the Division can require a test at any time, if we believe that coal is being used as more than a back-up fuel. In addition, during the next renewal or other permit modification, the Division can review the need for additional testing.
- In addition, under the current language in Condition 5.4 of the permit, no further

testing for PM and PM₁₀ was required during the permit term since the results of the initial test were less than 50% of the limitations. Therefore, the permit includes a requirement to conduct a test for PM and PM₁₀ within 180 days of renewal permit issuance.

- The language regarding operating parameters included in Condition 5.5 has been removed. This condition required the source to establish operating parameters to be monitored during the initial stack test and revised again in future stack tests. According to the Division's inspection reports, data from the stack tests was used to set the emission factor, which is used to monitor compliance with the emission limitations. The Division's field services unit has not required any other additional monitoring of operating parameters and as a result these requirements have been removed from the permit.
- The emission factors from the performance test were included in the permit (Conditions 5.4 and 5.5), note that the source shall use emission factors from the most recent stack test.
- In addition, emission factors were added to the permit in the event that coal is burned as fuel. Emission factors for PM, PM₁₀, SO₂, NO_x and CO are from a 1988 stack test conducted on the dryer while burning coal. Emission factors for VOC and Pb are based on the emission factors from the latest stack test on the dryer when burning natural gas. The Division considers that these factors for VOC and Pb are the best available, as there were no published factors that were appropriate to use. If stack testing is conducted when burning coal as fuel, emission factors from the stack test shall be used to estimate emissions.
- In the summary table, under Condition 5.7, monitoring for the 20% and 30% opacity requirements are listed as semi-annual method 9s. However, compliance with these limits are actually based on daily visible emission checks with method 9s as required. Therefore, language in the summary table has been revised to reflect this.

Section II.10 – Kiln and Clinker Cooler

- The format for Condition 10.3 was revised to clarify the specific requirements.
- Removed the note in Condition 10.4 that states that ("this condition 10.5 remains in effect after the compliance date"), it appears that the note should reference condition 10.4 and since condition 10.4 is included in the renewal permit, which will be issued after the MACT compliance date, this note is not necessary.
- In addition, the language was revised in condition 10.4 to state that the PM emission rate from each stack test shall be computed based on the provisions in 40 CFR Part 63 rather than Part 60.
- Corrected the reference to Condition 10.5 in the first sentence of Condition 10.5, the correct reference is to Condition 10.6.
- Removed the phrase "on which these standards are based" from Condition 10.5, since this language is not included in the referenced regulation.
- In January 2008, at the request of the Field Services Unit, minor language changes were made to Condition 10.7 to specify that the CEMS shall be operated in accordance to a Division-approved QA/QC plan.
- Condition 10.8 was revised to correctly reflect the language in the regulation.

The reg specifies that compliance with this requirement shall be monitored on a daily basis.

Section II.11 –

- Removed Condition 11.7. This limit specifies the grain loading limitation for emission group P011; however, these limitations are addressed in Condition 11.1.
- In the summary table, under Condition 11.4, monitoring for the 20% and 30% opacity requirements list semi-annual method 9s. However, compliance with these limits are actually based on daily visible emission checks with method 9s as required. Therefore, language in the summary table has been revised to reflect this.

Section II.12 –

- In the text, there are two Condition 12.1s; these conditions and those that follow were renumbered correctly.
- In the summary table, under Condition 12.5, the frequency of Method 22 observations is listed as daily. However, the clinker hopper, which is subject to the MACT requirements is classified as equipment other than kilns, in-line kiln/raw mills, clinker coolers, new and reconstructed raw material dryers and raw and finish mills and frequency of method 22s for these sources is monthly to annually. Therefore, the table has been revised to reflect this.

Section II.13 –

- The underlying construction permit limited hours of operation for the waste dust silo (8064 hrs/yr), the cement silo (3000 hrs/yr) and CKD loadout spout (3000 hrs/yr) were not included in the Title v permit. These requirements were included in the renewal.
- In addition, the permit was revised to indicate that only the waste dust silo (S001) is subject to CAM. The draft renewal permit had indicated that emission points 040A and 040B were subject to CAM. In the renewal these points were renumbered as S001 (previously 040B) and S066 (previously 040A). The technical review document for the renewal demonstrated that S066 had uncontrolled emissions below the major source level (see page 9 of this document).
- In the summary table, under Condition 13.5, monitoring for the 20% and 30% opacity requirements list semi-annual method 9s. However, compliance with these limits are actually based on daily visible emission checks with method 9s as required. Therefore, language in the summary table has been revised to reflect this.

Section II.15 – Conditions 15.3.2.(i) and 15.3.2.(ii), were renumbered as 15.3.2.1 and 15.3.2.2, to be consistent with the numbering scheme in the permit.

Section II.16 – Opacity Daily Walk Through

- revised this condition to state that the corrective process or maintenance action

would be taken “as soon as practicable”.

- In addition added language stating that the facility wide check included remote locations of the facility (Dowe Flats and the conveyor) and that the daily checks for the remote locations were not required on days when operations were not occurring at those locations.
- Finally a statement was added specifying that the CAM sources were subject to specific visible emission observations as specified in the CAM plan (Appendix H).

Section II.18 – Reporting

Replaced the phrase “compliance monitoring report” with “monitoring and permit deviation report” to match the terminology provided in Appendix B of the permit.

Section II.20 – Opacity and PM Limits for Subpart OOO Sources

- removed the reference to 60.675(c). This section of the NSPS relates to opacity observations from fugitive emission sources and do not apply to the crusher and baghouses, since emissions from these sources are vented through baghouses and are considered stack emissions.
- The condition has been revised to specify that the semi-annual opacity observations shall be conducted for the primary crusher baghouse and a representative baghouse on the conveyor. This is consistent with the performance testing requirements.
- In addition, the permit was revised to specify that the length of the opacity observation is six minutes.
- The language was also revised to specify that any observations that exceed the standard shall be submitted with the next scheduled monitoring and permit deviation report.
- In addition added language from the C.R.S. specifying that exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance until a Method 9 reading is taken that shows compliance.

Section II.21 – Opacity Limits

Removed the phrase “on which these standards are based” from Condition 21.1, since this language is not included in the referenced regulation.

Section II.22 – PM Stack Testing

Revised this condition to indicate that the frequency of testing is specified in the specific permit condition.

Section II.23 – NESHAP requirements for Portland Cement Plants

- Removed the Initial Notification requirement, since the initial notification has been submitted.
- The initial compliance date was removed but the compliance dated for the good combustion practices requirement was included.
- Corrected the typo in Condition 23.8 (reporting requirements), replaced “CMS³/₄”, with “CMS”.
- Included the recordkeeping requirements for CKD and fly ash as they were not

included. Note that these were included in the MACT in the December 20, 2006 revisions.

- Specified the operating standards for kilns. In addition to the temperature monitoring requirement (which was previously just referenced), this include the revisions made in December 20, 2006: good combustion practices, CKD requirements and restrictions on the use of fly ash.
- Revised the language under “compliance with nonopacity emission standards” to be more consistent with the language in 63.6(f)(1).
- Some minor format changes were made to the performance testing for nonopacity emission standards and the language regarding retesting with feed or fuel changes was revised to match the current language in the regulation.
- Removed the language for monitoring compliance with the D/F standard for kilns using carbon injection, since carbon injection is not used. In addition, added monitoring requirements for fly ash that were included in the December 20, 2006 revisions to the MACT.
- Made some minor revisions in the language for the opacity standards to reflect current reg language.
- The parenthetical list above condition 23.9.4 is incomplete, this was revised to include all emission groups subject to the MACT standards listed in this condition. This parenthetical list was also corrected under “monitoring requirements”
- Removed the “CHECK” after Subpart LLL under “notification of opacity and visible emission observations”.
- Revised the monitoring requirements for the finish mill to reflect current reg language.
- Added a header in bold to note the “additional notification requirements for sources with continuous monitoring systems”.
- Revised the language for the temporary, conditioned exemption for particulate matter and opacity standards to more closely resemble reg language.

Section II.24 – CAM Requirements

- Corrected permit condition references in conditions 24.1.3.1, 24.1.3.5, 24.1.4.1.b and 24.1.4.2.a. The first part of the reference, “24.5” was replaced with “24.1”.
- Revised the excursion criteria to indicate visible emissions (all units but kiln), any six minute opacity reading at or above 15% (kiln), any instance where the six minute average opacity reading increases and remains consistently equal to or greater than 10% for a period exceeding eight (8) hours (kiln) and a pressure differential at or below 0 and above 7 inches of water.
- Removed 040A and 040B from the list. These emission points were renumbered in the renewal to S001 (040B) and S066 (040A). According to page 9 of this document the cement silo (S066) is not subject to CAM.

Section III – Permit Shield

Corrected the cite under “Streamlined Conditions” for Reg 6 Part B, Section II.C.2, it should be III.C.2 and noted that the requirement is State-only.

Section IV – General Conditions

The upset requirements in the Common Provisions Regulation (general condition 3.d) were revised December 15, 2006 (effective March 7, 2007) and the revisions were included in the permit. Note that these provisions are state-only enforceable until approved by EPA into Colorado's state implementation plan (SIP).

Removed the paragraph from Condition 3.g (affirmative defense provisions for excess emissions during startup and shutdown) regarding "state-only enforceability", these provisions have been approved by EPA, with one exception which is noted in Section I, Condition 1.4.

Replaced the reference to "upset" in Condition 5 (emergency provisions) and 21 (prompt deviation reporting) with "malfunction".

Appendices

Changed the title of appendix B in the list of appendices that is at beginning of the appendices.

Renumber Appendices so that page number starts at "page 1" for each separate appendix.

A Safety-Kleen cold parts cleaner is identified in the list of insignificant activities in Appendix A and the specific APEN exemption is noted. The specific APEN exemption that is noted is incorrect. The exemption under Reg 3, Part A, Section II.D.1.ddd is for crude oil storage tanks with a capacity of 40,000 gallons or less and clearly this exemption does not apply to the parts cleaner. The Division considers that this unit would be exempt from APEN reporting requirement because emissions are below the APEN de minimis level of 2 tons/yr of VOC (Reg 3, Part A, Section II.D.1.a) and the permit will be revise to reflect that. Although emissions from the parts cleaner are below the APEN de minimis level and therefore the unit is exempt from both APEN reporting and construction permit requirements, it is still subject to requirements in Colorado Regulation No. 7, Section X. Under the "catch-all" provisions in Regulation No. 3, Part C, Section II.E (2nd paragraph) the unit cannot be considered an insignificant activity because they it is subject to specific requirements in Regulation No. 7. Since this renewal permit has already gone through public comment, the Division will leave the unit in the insignificant activity list but will include a note indicating that it is subject to the requirements in Regulation No. 7, Section X. Note that this unit will be moved to Section II of the permit the next time this permit is modified.

Replaced Appendices B and C with latest versions.

Corrected header for Appendix B.

Changed mailing address for EPA in Appendix D.

Appendix H – CAM Plan

The CAM Plan was revised to more adequately address the visible emission monitoring for all emission sources except the kiln and clinker cooler. An excursion shall be any day on which visible emissions are observed. In addition, revised the indicator range and accuracy for the pressure differential monitoring. Finally, since the kiln/clinker cooler have controlled emissions above the major source level, the frequency of monitoring must be continuous as specified in 40 CFR Part 64 § 64.3(b)(4)(ii). Therefore, the monitoring has been revised to reflect the use of the COMs rather than then daily visible emission checks that were initially included in the CAM plan.

June 1, 2007 Minor Modification

The source submitted an application to modify their Title V permit on June 1, 2007 to replace the A2 silo (825-3, stack id 045, emission point P013) and the A5 silo (525-28, stack id S067 and emission point P040) baghouses. Although the baghouses have a higher exhaust fan flow rate, they can meet a lower grain loading level, hence there is no increase in emissions. The source has not requested any change in the permitted material processing and emission limitations. The source indicated that this modification qualified as a minor modification and requested that those procedures be used.

Colorado Regulation No. 3, Part C, Section X.A identifies those modifications that can be processed under the minor permit modification procedures. Specifically, minor permit modifications “are not otherwise required by the Division to be processed as a significant modification” (Colorado Regulation No. 3, Part C, Section X.A.6). The Division requires that “any change that causes a significant increase in emissions” be processed as a significant modification (Colorado Regulation No. 3, Part C, Section I.B.36.h.(i)). Since there is no increase in emissions with this modification, the Division agrees that this modification qualifies as a minor modification.

The following changes were made as a result of this modification request.

Page following Cover Page

Changed the Responsible Official and Permit Contact.

Section II.13

The source indicated that they were replacing baghouses 825-3, which controls emissions from the A2 cement silo and baghouse 525-28, which controls emissions from the A5 cement (CKD) silo. Baghouse 825-3 is included in a group with seven other baghouses with shared emission and throughput limitations. The emission point

is identified as P013 (stack Id S045, AIRS ID 013). The underlying construction permit for this group of emission units is 98BO0259 and this emission group is included in Section II.11 of the renewal permit. Baghouse 525-28 is included in a group with two other baghouses with shared emission and throughput limitations. The emission point group is identified as S001, S066 and S067 (Facility ID 007A, AIRS ID 040). The underlying construction permit for this group of emission units is 98BO0315. However, in an e-mail received on October 31, 2007, CEMEX indicated that they had incorrectly indicated that the A2 cement silo baghouse would be replaced and that in actuality, they had replaced the waste dust silo baghouse (baghouse 225-3). The waste dust silo is included in the same emission group as the A5 cement silo, S001, S066 and S067 (Facility ID 007A, AIRS ID 040, underlying construction permit 98BO0315).

Emissions from these baghouses are estimated using the baghouse grainloading (gr/scf), hours of operation and the maximum design flow rate of the baghouse. The current permit indicates that the baghouses meet a grain loading limit of 0.03 gr/dscf for PM (PM₁₀ is presumed to be 50% of PM) and the source indicates that the new baghouses will meet a grain loading limit of 0.01 gr/dscf of PM. New baghouse 525-28 has a higher design flow rate than the previous baghouse and new baghouse 225-3 has the same design flow rate as the baghouse. Therefore although the new baghouse for the A5 silo will have a higher design flow rate (3800 acfm vs. 2600 acfm), with the lower grain loading limit, PM and PM₁₀ emissions will not increase. The comparison in emissions with the old baghouse and the replacement baghouse are shown in the below tables.

Baghouse 525-28 (A5 Cement (CKD) Silo)

	Baghouse Flow (ACFM)	Grain Loading (gr/dscf)	PM Emissions ¹ (tons/yr)	PM ₁₀ Emissions ¹ (tons/yr)
After Mod	3,800	0.01	0.40	0.20
Prior to Mod	2,600	0.03	0.82	0.41
Change In Emissions			-0.42	-0.21

¹Emissions are based on 3000 hours per year of operation

Baghouse 225-3 (S001 Waste Silo)

	Baghouse Flow (ACFM)	Grain Loading (gr/dscf)	PM Emissions ¹ (tons/yr)	PM ₁₀ Emissions ¹ (tons/yr)
After Mod	16,100	0.01	13.7	6.85
Prior to Mod	16,100	0.03	4.6	2.3
Change In Emissions			-9.1	-4.55

¹Emissions are based on 8064 hours per year of operation

Since the new baghouses are expected to meet lower grain loading standards, the Division considers that a performance test is required to verify that the units can meet the 0.01 gr/dscf specification. A performance test will be required within 180 days of renewal permit issuance.

In addition, the Division revised the permit to include the maximum design flow rate of each of the baghouses, since these are used in emission calculations. The Division has included the design flow rates for all emission groups even though some emission groups are not affected by this modification.

The Division revised the language in Section II.13 to clarify permit requirements. To that end the permit was revised to require that twelve month rolling totals of emissions be maintained, clarify that subsequent stack testing shall be conducted every five years, including tests to determine the percentage of PM emissions that is PM₁₀ and to remove the monthly limitations since these only apply during the first year of operation. The last revision to the underlying construction permit (98BO0315), which set the monthly limits was April 8, 2004; therefore more than one year has passed since the throughput limit was increased and only the annual (and daily) limitations apply.

Finally, it appears that the hours of operation limit set for emission point P040 in the construction permit (identified as S001, S066 and S067 in the Title V permit) was inadvertently not included in the operating permit; therefore, it is being included in the permit at this time. Note that according to page 5 of this document, the waste dust silo (S001) is limited to 8064 hours per year of operation and the A5 silo and CKD loadout spouts (S066 and S067) are limited to 3000 hours per year. This change is also noted on page 16 of this document.

Section II.11

Although this minor modification ultimately did not affect Section II.11, the Division made changes to this section to be consistent with the changes made to Section II.13 and to incorporate the latest revisions to construction permit 98BO0259.

The Division revised the permit to include the maximum design flow rate of each of the baghouses, since these are used in emission calculations.

In addition, the Division revised the language in Section II.11 to clarify permit requirements. To that end the permit was revised to require that twelve month rolling totals of emissions be maintained, clarify that subsequent stack testing shall be conducted every five years, including tests to determine the percentage of PM emissions that is PM₁₀ and to remove the monthly limitations since these only apply during the first year of operation. The last revision to the underlying construction permit (98BO0259), which set the monthly limits was April 11, 2006; therefore more than one year has passed since the throughput limit was increase and only the annual (and daily) limitations apply.

Finally, with this modification, the Division is incorporating the revisions made in the April 11, 2006 construction permit (98BO0259). This modification was to increase the throughput for emission point P013 (from 631,600 tpy to 681,600 tpy – to include 50,000 tpy of imported cement). The April 11, 2006 revised construction permit went through

public comment and the increase in permitted emissions from this modification were below the significance level (PM – 0.91 tpy and PM₁₀ – 0.5 tpy); therefore, as discussed above under the June 1, 2007 minor modification, incorporating this revision into the renewal permit would qualify as a minor modification.

Incorporation of Additional Construction Permits and/or Revisions To Construction Permits

98BO0292 – Initial Approval, Modification No. 2, Issued 6/19/06

The permit was revised to allow for the transfer and handling of iron slag (Section II.3 of the permit). The allowable throughput for slag was set at 50,000 tons/yr. The increase in permitted emissions was 1.89 tons/yr of PM (increased from 13.61 tons/yr to 15.5 tons/yr) and 0.86 tons/yr of PM₁₀ (increased from 6.14 tons/yr to 7 tons/yr). The daily throughput and emission limits for PM₁₀ was not included in the revised construction permit. Since the daily emission limits are necessary to protect the NAAQS, the daily throughput and emission limits will remain in the permit. The daily throughput limit of 4,375 tons/day shall include all materials including slag.

As discussed above under the June 1, 2007 minor modification, since the increase in permitted emissions associated with this construction permit revisions are below the PSD significance levels, incorporating this revision into the renewal permit would qualify as a minor modification.

05BO0703, Initial Approval Issued April 11, 2006

This construction permit was issued to install and operate a custom cement rail car unloading and handling system, consisting of a hopper to receive cement from bottom unloading railcars, a screw conveyor to convey and transfer cement from the hopper to the pneumatic pump and a pneumatic transfer system to convey the cement from to the silos. Emissions from this process are controlled by a baghouse, identified as BH725-4 in the construction permit. Note that a letter received August 17, 2006 from the source indicated that the baghouse identification number should be correct to 825-8. The baghouse id is correctly noted in the table in Section I, Condition 4.1 of the permit. The baghouse is required to meet a grain loading specification of 0.02 gr/dscf; however, permitted emissions were based on an emission factor, requested throughput and a control efficiency of 99%. Permitted emissions were set at 0.6 tons/yr of PM and 0.3 tons/yr of PM₁₀ and the permitted cement throughput emission rate was set at 50,000 tons/yr. A review of the preliminary analysis indicates that using the permitted throughput and the specified emissions factors that PM₁₀ emissions are actually 0.36 ton/yr, therefore, the Division has revised the emission limit for PM₁₀ to be 0.4 tons/yr.

Note that uncontrolled emissions at the requested throughput rate from the railcar unloading and handling system are below the major source level; therefore, CAM does not apply to this emission unit.

The renewal permit was revised to include the appropriate provisions from this construction permit into the renewal permit. As discussed above under the June 1, 2007 minor modification, since the increase in permitted emissions associated with this construction permit revisions are below the PSD significance levels, incorporating this revision into the renewal permit would qualify as a minor modification.

September 17, 2007 Minor Modification

The source submitted an application to revise their Title V permit on September 17, 2007 to replace two existing cement loadout spouts (east and west loadout spouts) and the two baghouses that control those spouts (825-4 and 825-5). In addition, they proposed to replace the existing cement kiln dust (CKD) loading spout and associated baghouse (825-7). The baghouses associated with the cement loadout spouts are included in the emission group for AIRS pt 013 (underlying construction permit 98BO0259, emission group P013), identified as S046 and S047. Note that the permit indicates that S046 and S047 are associated with the cement silos and are noted under AIRS point 013, but the cement loadout spouts are noted as AIRS point 012, but they are all within the emission group identified as P013. The baghouse associated with the CKD loadout spout is included in the emission group for AIRS pt 040 (underlying construction permit 98BO0315), identified as S067. The proposed replacement baghouses have a lower exhaust fan flowrate and can meet a lower grain loading level, hence there is no increase in emissions. The source has not requested any change in permitted processing and emission limitations. The source indicated that this modification qualified as a minor modification and requested that those procedures be used.

Colorado Regulation No. 3, Part C, Section X.A identifies those modifications that can be processed under the minor permit modification procedures. Specifically, minor permit modifications “are not otherwise required by the Division to be processed as a significant modification” (Colorado Regulation No. 3, Part C, Section X.A.6). The Division requires that “any change that causes a significant increase in emissions” be processed as a significant modification (Colorado Regulation No. 3, Part C, Section I.B.36.h.(i)). Since there is no increase in emissions with this modification, the Division agrees that this modification qualifies as a minor modification.

In an October 31, 2007 e-mail, CEMEX indicated that the replacement for the cement loadout spouts and baghouses (825-4 and 825-5) will not occur at this time. They will request a modification to the permit at a later date to replace the cement load-out spouts. CEMEX did indicate that the CKD loadout spouts and baghouse were replaced.

Emission information related to the CKD loadout spout baghouse change (825-7) is shown in the table below.

	Baghouse Flow (ACFM)	Grain Loading (gr/dscf)	PM Emissions ¹ (tons/yr)	PM ₁₀ Emissions ¹ (tons/yr)
After Mod	1,400	0.01	0.15	0.07
Prior to Mod	2,600	0.03	0.82	0.41
Change in Emissions			-0.67	-0.34

¹Emissions are based on 3000 hours per year of operation

Since the new baghouse has a lower design flow rate than the previous baghouse, emissions would be lower than the previous baghouse without taking a lower grain loading limit on the baghouse. Therefore, the Division considers that it is not necessary to require a performance test on this baghouse. In addition, it should be noted that two of the three baghouses within this emission group have been replaced under the June 1, 2007 modification and testing is required for those baghouses, the Division considers that sufficient testing for this emission group.

Page following Cover Page

Changed the Responsible Official and Permit Contact.